



United States Attorney  
Southern District of New York

The Silvia J. Mollo Building  
One Saint Andrew's Plaza  
New York, New York 10007

July 17, 2007

By Facsimile

Honorable Paul A. Crotty  
United States District Judge  
500 Pearl Street, Room 735  
New York, New York 10007

Re: United States v. Raphael Agbune and Linda Loving,  
07 Cr. 395 (PAC)

USDS SDNY  
DOCUMENT  
ELECTRONICALLY FILED  
DOC #: \_\_\_\_\_  
DATE FILED: July 18, 2007

Dear Judge Crotty:

*Keelholtz*  
✓ Application GRANTED  
SO Ordered

The Government respectfully submits this letter to request an adjournment of the pre-trial conference scheduled for Thursday, July 19, 2007, at 2:30 p.m. Counsel for both defendants and for the Government expect dispositions as to each defendant within the next three weeks. Due to scheduling conflicts, the parties respectfully request that Your Honor schedule a separate conference for each defendant. [ I have communicated with Your Honor's deputy about possible adjournment dates for each defendant. As to defendant Agbune, the Government and counsel for Agbune respectfully requests adjourning the conference until Thursday, July 26, 2007, at 12:00 p.m. As to defendant Loving, the Government and counsel for Loving respectfully requests adjourning the conference until the afternoon of August 2, 2007. Both of these dates were provided by Your Honor's deputy as dates that were convenient for the Court. ]

*Keelholtz*  
✓ If Your Honor does grant an adjournment, then the Government respectfully requests that the Court exclude time from July 19, 2007, until August 2, 2007, pursuant to the Speedy Trial Act, Title 18, United States Code, Section 3161(h)(8)(A). The ends of justice served by such continuance outweigh the interest of the public and the defendant in a speedy trial because the continuance will allow both defendants time to review discovery, and have any appropriate discussions regarding a possible

MEMO ENCL

- Hon. Paul A. Crotty  
July 17, 2007  
Page 2

disposition of this case. Counsel for both defendants consent to this request for the exclusion of time.

Respectfully Submitted,

MICHAEL J. GARCIA  
United States Attorney

By: Todd Blanche  
Todd Blanche  
Assistant United States Attorney  
(212) 637-2494  
(212) 637-2937 (facsimile)

cc: Philip L. Weinstein, Esq.  
Attorney for Raphael Agbune  
(by facsimile)

Lance Croffoot-Suede, Esq.  
Attorney for Linda Loving  
(by facsimile)